

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

2010 JAN 22 AM 11:14

FOR THE COURT

KEVIN COLE, )  
PLAINTIFF, )  
 )  
vs. )  
 ) Cause Number:  
TRANSWORLD SYSTEMS, INC. )  
DEFENDANT. )

2 10 CV 038

**COMPLAINT AND DEMAND FOR JURY TRIAL - INDIVIDUAL**

Plaintiff, Kevin Cole ("Mr. Cole") on behalf of himself, by counsel, Michael P. McIlree, for his Complaint against the Defendant, Transworld Systems Inc. alleges and states as follows:

**INTRODUCTION**

1. This is an action for damages brought by the Plaintiffs, for the Defendant's violations of the Federal FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692, *et seq.* (hereinafter referred to as "FDCPA") which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

**JURISDICTION**

2. This Court has jurisdiction over the claims in this matter pursuant to 15 U.S.C. § 1692.

**PARTIES**

3. Mr. Cole is an individual consumer currently residing in Porter County, Indiana.

4. Transworld Systems Inc. is a collection agency incorporated in the State of California who collects debts nationwide including the State of Indiana. Transworld Systems Inc.

has an office located at 9302 N. Meridian, St., #335, Indianapolis, IN 46260.

5. Defendant regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another.

6. Transworld Systems Inc. is a debt collector as defined by 15 U.S.C. § 1692a(6).

#### **FACTUAL ALLEGATIONS**

7. On or about December 22, 2009, Defendant by an agent made a call to Plaintiff's mother regarding an account placed for collection concerning a medical bill allegedly owed to Porter County Primary Care.

8. Defendant through its' agent told Mr. Cole's mother that he was trying to collect a debt and that Plaintiff had given them her phone number.

9. On or about December 22, 2009, Defendant by an agent called Plaintiff's former employer indicating that they were looking for him in regards to collecting a debt.

10. Despite having Plaintiff's contact information, Defendant chose this path of conduct in violation of the Fair Debt Collection Practices Act.

#### **VIOLATIONS OF THE FDCPA BY DEFENDANT**

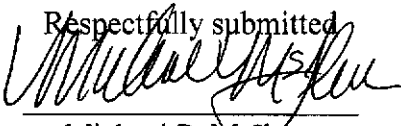
11. Defendant has violated 15 U.S.C. §1692c.

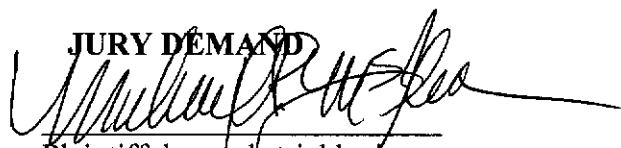
12. Defendant has violated 15 U.S.C. §1692d.

13. Defendants have violated 15 U.S.C. §1692f.

WHEREFORE, plaintiff request that the Court enter judgment in his favor against the Defendant for:

1. The maximum amount of statutory and actual damages provided under the FDCPA.
2. Attorney's fees, litigation expenses and costs.
3. Such other and further relief as is appropriate.

Respectfully submitted  
By   
Michael P. McIlree

**JURY DEMAND**  
  
Plaintiff demands trial by jury.

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**Attorney at Law**  
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**Attorney for Plaintiff**

#### VERIFICATION

I declare that the above referenced statements are true and accurate to the best of my knowledge and belief.

  
KEVIN COLE, Plaintiff